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:	Chapter 15
:	Case No. 15-10616 (MEW)
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Debtor in a Foreign Proceeding :

UNITED STATES BANKRUPTCY COURT

## MOTION TO STAY VACATUR ORDER PENDING APPEAL

SPV 1 LLC ("SPV") respectfully moves in accordance with Rule 8005 of the Federal Rules of Bankruptcy Procedure and the parties Stipulation governing this stay motion [D.E. 77], for an order staying the Court's opinion and order dated December 15, 2015, granting the motion of Daebo International Shipping Co., Ltd. (the "Foreign Debtor"), to vacate the maritime attachments ("Attachment") in respect of the M/V DAEBO TRADER in Louisiana [D.E.s 75 & 76] ("Vacatur Order") pending SPV's appeal of the Vacatur Order.

## **HOLLAND & KNIGHT LLP**

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